

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of
Digital Audio Broadcast Systems
and Their Impact on
Terrestrial Broadcast Service

)
)
)
)
)
)

MM Docket No. 99-325

**REPLY COMMENTS OF
BONNEVILLE INTERNATIONAL CORPORATION**

Bonneville International Corporation (“Bonneville”) hereby submits its reply comments in response to the Commission’s April 19, 2002, *Public Notice* in the above-referenced proceeding. The *Public Notice* seeks comment on the National Radio Systems Committee (“NRSC”) evaluation of the iBiquity Digital Corporation (“iBiquity”) AM In-Band-On-Channel (“IBOC”) Digital Audio Broadcast (“DAB”) system and the iBiquity AM IBOC test results. A number of Commenters in this proceeding have expressed support for the conclusions and recommendations of the NRSC. Bonneville in these reply comments joins these Commenters in their support of the iBiquity AM IBOC DAB system.

I. STATEMENT OF INTEREST

Bonneville is a diversified media company that operates twenty radio stations (both AM and FM) in larger markets across the country.¹ Bonneville also has an ownership interest in iBiquity, the developers of the subject IBOC technology; and has been involved in the testing and selection process for a digital broadcast system since its infancy. A representative of Bonneville has served on committees, sub-committees, and chaired one working group in the DAB selection process. Bonneville’s FM station in San Francisco, KDFC-FM, has been host to digital signal testing of a system similar to iBiquity’s IBOC system. Bonneville’s AM station, WTOP(AM), in Washington

¹ These stations are licensed to a Bonneville affiliated company.

D.C., has tested AM IBOC technology. Based upon its first-hand experience at these two stations, Bonneville can confirm that IBOC technology works well from a technical standpoint and, thus, fully supports the conclusions drawn in the NRSC report regarding iBiquity's AM IBOC DAB system. Bonneville urges the Commission to promptly proceed with the adoption of IBOC technology as the digital solution for DAB in the United States.

II. TESTS HAVE DEMONSTRATED THAT IBOC WILL BE A SUCCESSFUL TECHNOLOGY

As mentioned above, WTOP(AM), in Washington, D.C. has undertaken IBOC digital signal testing. WTOP(AM) conducted IBOC DAB daytime digital signal testing for over a year. The station received no complaints of signal degradation to the analog channel during this testing period. The slight delay to the delivery of the analog signal caused by the implementation of the IBOC DAB technology is manageable and the necessary narrowing of the analog audio bandwidth has not presented any problems. Simply put, based on Bonneville's experience, IBOC is a workable technology.

III. CONCLUSION

For the reasons set forth above, Bonneville supports the conclusions of the NRSC. The Commission should promptly proceed with selection of IBOC technology as the digital solution for the United States.

Respectfully submitted,

BONNEVILLE INTERNATIONAL CORPORATION

By: /s/
J. Talmage Ball
Vice President, Broadcast Engineering

July 19, 2002